

Exhibit 1

SUBPOENA TO PARENTS – DRAFT REQUESTS FOR PRODUCTION

REQUEST NO. 1: All Documents Concerning the Plaintiff's application(s) for financial aid for undergraduate education, any decision Concerning such an application, or any appeal of such a decision, including supporting Documents or information used in connection with any such application or appeal, including but not limited to tax returns; W-2s, 1099s, K-1s, and other tax forms; records of untaxed income; and records of assets.

REQUEST NO. 2: All Documents Concerning financial aid, scholarships, loans, or other financial support for the Plaintiff's undergraduate education, including the amount and terms of any merit or need-based financial aid the Plaintiff applied for, received, was denied, or declined to accept in connection with the Plaintiff's undergraduate education and Communications with any Institution Concerning financial aid.

REQUEST NO. 3: Documents sufficient to show all payments of tuition and fees, room, board, and books and supplies by the Plaintiff, You, or anyone acting on behalf of the Plaintiff or You, to the Institution at which the Plaintiff received an undergraduate education, including the identity of all payor(s), dates, and amounts of such payments.

REQUEST NO. 4: All Documents Concerning the Plaintiff's consideration of, evaluation of, or decision to attend or not attend, the full-time undergraduate program of any Institution, including (1) the Plaintiff's application(s) for admission to any Institution; (2) the Plaintiff's reasons for applying or not applying for admission to any Institution or for matriculating at or not matriculating at any Institution; (3) any decision made by the Institution Concerning the Plaintiff's application; (4) the advantages or disadvantages of attending any Institution; and, (5) the similarities or differences between two or more Institutions or other comparisons of Institutions, including a ranking of any Institutions.

REQUEST NO. 5: All Documents Concerning the Action or the matters alleged in the Complaint.